



February 20, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

Federal Communications Commission (FCC) action on USF reform appears to be imminent. As a part of that reform, the FCC is expected to provide up to \$200 million in additional funding for model adapters, in the form of CAF reserves.¹

Baraga Telephone, a rural local exchange carrier (RLEC) in Michigan, serves customers across four exchanges. Baraga Telephone (SAC 310675) provides a modern suite of services for its customers and hopes model participation will provide an opportunity for it to continue making prudent invests to serve its communities.

One concern for Baraga Telephone, however, are proposals suggesting the FCC preclude companies with widespread availability from opting into the model and proposals suggesting the FCC divert CAF reserve funds away from model adopters who have already deployed 10/1 service.² Baraga Telephone understands the desire to focus USF resources where they are most needed, but agrees

¹ Cheryl L. Parrino ex parte filing dated January 19, 2016. Accessed at <https://prodnet.www.neca.org/publicationsdocs/wwwpdf/12016ne.pdf>.

² WTA ex parte filing dated May 15, 2015 stating "CAP reserves should be focused upon study areas that have lower percentages of 10/1 broadband build-out." Accessed at <http://apps.fcc.gov/ecfs/document/view;NEWECFSSSESSION=yGWLvVvfnQNV95KvI31z6LgBW4v0knJtmTr2PJp20bGJ2V5GcPyBI-668154738!683247717?id=60001048973>.

with NTCA that “measures of 10/1 service based upon Form 477 data could yield illogical and even troubling results.”³

In fact, the data filed for Baraga Telephone in the March and September 2015 477 Filings did not accurately represent Baraga’s 10/1 Mbps coverage. Baraga Telephone filed revised Form 477s on Friday, January 29. The revised filings are accurate and show significantly lower 10/1 availability.

Baraga Telephone urges the FCC to utilize the most recent Form 477 information available. Utilizing outdated Form 477 information could have a serious adverse impact on Baraga Telephone, inappropriately precluding it from model participation. If any additional information on this matter can be helpful to the FCC, please let us know.

Sincerely,



Dustin “Dusty” Johnson
Vice President of Consulting

³ NTCA ex parte filing dated Dec 15, 2015. Accessed at <http://apps.fcc.gov/ecfs/document/view;NEWECFSSESSION=tcGvWywYNjK2v5q3vT6hwKWGGvFvr4xvqFkD0yFZ8jLBGGmgNTW0!1749169674!-22619469?id=60001356976>.